

REMARKS

1. The Examiner has required a restriction, has requested missing information, and has objected to Claims 1-19 and 20-22. The Examiner has also rejected Claims 1-7, 9-12, 14-17 and 19 under 35 U.S.C. § 102(e) and has rejected Claims 8, 13 and 18 under 35 U.S.C. § 103(a).

2. The Examiner's restriction in the present Office Action to Claims 1-19²² is acknowledged, but traverse is maintained. The Examiner has required a restriction on the grounds that the subcombination (Claims 23-29) has utility by itself or in other combinations.

3. The Examiner has objected to Claims 1-19 primarily for reasons of antecedent basis. Claims 1, 6, 14 and 15 have been amended to correct antecedent basis. Applicants have not amended Claim 1, line 12, per the Examiner's suggestion, because the proposed amendments seem to suggest a method claim rather than a combination claim. The Examiner is thanked for his courtesy in pointing out the need for correction in the other suggestions.

4. The Examiner has objected to Claims 20-22 as substantially duplicating claims 26-27. The Examiner, however, has entered a restriction requirement as to Claims 23-29 as being withdrawn from consideration. Therefore, Claims 20-22 are not substantially duplicated in the claims being considered. The Examiner is requested to examine Claims 20-22.

5. Claims 1-7, 9-12, 14-17 and 19 are rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Pat. No. 6,367,949 to John C. Pederson ("Pederson"). The Examiner states that Pederson discloses an integrated light and accessory assembly shown in Fig. 15B of Pederson, along with portions of the text of Pederson and a switch ("inherent") and a light detector sensor ("not shown"). Applicants are unable to locate a Fig. 15B in Pederson, and believe that the Examiner meant to refer to Fig. 2. If this is not correct, the Examiner is requested to notify Applicants.

Applicants traverse the rejections under § 102(e). Pederson is limited to an "LED utility lamp." The Examiner cites a number of features mentioned in Pederson, and concludes that the above-listed claims are anticipated by Pederson. Claim 1 of the present invention claims an insulator, at least one reflector mounted on said insulator, and at least one conductor mounted on said insulator, and at least one lamp connected to said at least one conductor and assembled inside said at least one reflector. Pederson does not describe a lamp connected to a conductor

mounted on an insulator. Instead, Pederson describes a lamp connected to an intermediate connector, a pair of paddles 70, described in col. 16, lines 59-63, and depicted in Figs. 4, 5, 10 and 11. Pederson does not describe a lamp as claimed in independent Claims 1 and 14, and their dependent claims.

Thus, at least one limitation of Claims 1 and 19 is not present in the reference. An invention is not anticipated when the same device or method, including all the limitations contained in the claims, is not described in a single prior art reference. M.P.E.P. 2131. In addition, elimination of an element, while retaining its function, is evidence of patentability. M.P.E.P. 2144.04. Applicants submit that the rejection under 35 U.S.C. § 102(e) is overcome, and respectfully request that the Examiner withdraw the rejections.

The Examiner has also rejected dependent Claims 9 and 10 under 35 U.S.C. § 102(e) as anticipated by U.S. Pat. No. 6,367,949 to John C. Pederson ("Pederson"). Dependent Claims 9 claims "a power storage device mounted to the housing" and dependent Claim 10 claims "a switch between the power storage device and the at least one lamp". In rejecting Claims 9 and 10, the Examiner states that the Pederson reference has a "power storage device" and a "switch (not shown) inherently provided either on the main control panel of the vehicle or locally on the housing of the device." P. 7, lines 1-2. Pederson does not teach or describe a switch in the patent. Pederson states, however, that the power source for the light "may be a low voltage power supply or a 12 volt power supply which is available in a standard emergency vehicle battery or other vehicle. The low voltage power supply or battery source may be integral to a vehicle or other structure. Alternatively, an electrical generator may be used as the electrical power source." A vehicle battery and an electrical generator clearly cannot be "a power storage device mounted to the housing" of an automotive light assembly; rather, Claims 9 and 10 envision a smaller power supply, a portable power supply, battery or power storage module, such as shown in Figs. 8-10 of the application, and described in the text accompanying the figures. Pederson does not describe a "power storage device mounted to the housing," nor does Pederson describe a switch. Accordingly, the rejection is overcome and the Examiner is requested to withdraw the rejections of dependent Claims 9 and 10.

6. Claims 8 and 18 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Pat. No. 6,367,949 to John Pederson ("Pederson") in view of U.S. Pat. No. 6,124,886 to Jonathan

DeLine et al. ("DeLine"). Dependent claims 8 and 18 claim an integrated light and accessory assembly wherein a transmitter from another claim from which claim 8 or 18 depends is selected from the group consisting of a toll transponder, a purchasing transponder, an RF transmitter, a microwave transmitter, and an IR transmitter. The Examiner states that Pederson does not teach an integrated light and accessory assembly comprising a transmitter, but that DeLine discloses a rearview mirror lamp comprising various devices, a light, and a toll transponder (transmitter). The Examiner also states that it would have been obvious to modify the assembly of Pederson by providing the toll transponder of DeLine, for benefits of size reduction and economical electronic packaging. Applicants traverse the rejection.

There is no motivation for combining the Pederson and DeLine references. To establish obviousness there must be some motivation, suggestion, or teaching of the desirability of making the specific combination that was made by the Applicant. M.P.E.P. 2142, at 2100-121. As discussed above, Pederson does not describe the present invention, and is directed to a utility lamp for use outside a vehicle. Deline is directed toward a modular rearview mirror assembly, that may have lights for the convenience of passengers inside the vehicle. The two situations would appear to be mutually exclusive, with Pederson's utility lamp directed to use outside the vehicle, while DeLine's rearview mirror is used inside a vehicle. There is no suggestion in Pederson that an improvement may be made through a rear-view mirror, nor does DeLine suggest that an improvement may be made by using the rear-view mirror outside the vehicle. Thus, there is no motivation for combining the references, and they indeed seem to be contradictory.

Even combined, the references do not teach the invention of Claims 8 and 18 for an integrated light and accessory assembly with a transmitter. As noted above, Pederson does not teach or describe an insulator, at least one reflector mounted on said insulator, and at least one conductor mounted on said insulator, and at least one lamp connected to said at least one conductor and assembled inside said at least one reflector. Instead, Pederson relies on intermediate connectors, which are not present in the claimed invention. One of the advantages of the invention is that the integrated light and accessory provides more functions with fewer parts. Specification, p. 2, lines 18-19. Thus, the prior art references do not teach or suggest all the claim limitations of the claimed invention.

In order to establish a prima facie case of obviousness, there must be some suggestion or motivation, either in the prior art or in the references themselves, to combine the teachings. The

prior art references must teach or suggest all the limitations of the claimed invention. M.P.E.P. 2142. With regard to the rejection of Claims 8 and 18, there is no motivation to combine the cited references, and even improperly combined, the references do not teach or suggest all the limitations of the claimed invention. Accordingly, the Examiner has not established a prima facie case of obviousness. The Examiner is respectfully requested to withdraw the rejection of Claims 8 and 18.

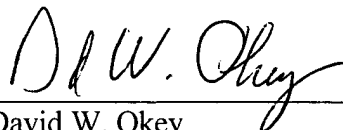
7. The Examiner has also rejected Claim 13 under 35 U.S.C. § 103(a) as unpatentable over U.S. Pat. No. 6,367,949 to John Pederson ("Pederson") in view of Japan Pat. No. JP 07-142820 to Okawa ("Okawa"). The Examiner states that Okawa discloses a multi-layer laminate for a multi-layer circuit board, including a plurality of layers of insulation mounted on a conductor 1'a, 1'b, and 1'c, in Fig. 4. The Examiner states that Okawa does not disclose the use of the insulated conductor layers, but "one of these conductors could be adapted for return." Office Action, p. 8, lines 15-16. Claim 13 claims an integrated light and accessory assembly, with an additional layer of insulation mounted to the at least one conductor and a ground plane or return mounted to the additional layer of insulation.

Applicants traverse the rejection. Again, there is no motivation for combining the references. In addition, the drawings do not support the Examiner's assertion concerning multi-layer insulating layers having a conductive return. While some of the figures are blurred, the figure on page 1 and Fig. 4 on page 5, with the same numerals as the other figures, clearly have diagonal lines alternately heavy and light, indicating, as the Examiner states, multiple layers of insulation. See M.P.E.P., § 608.02 at 600-95 (table indicating that this represents a cross section of synthetic resin or plastic). The same figures, however, show no second layer of conductive material or metal that could be used for a ground plane or return line.

In order to establish obviousness, the prior art reference or references must teach or suggest all the claim limitations. M.P.E.P. § 2143. The references cited by the Examiner fail to teach at least the ground plane limitation. As noted above in the discussion of Claims 8 and 18, the cited references also do not teach or suggest at least one other limitation of the claimed invention. Thus, the Examiner has not established a prima facie case of obviousness. Applicants submit that the Examiner's rejection is overcome. Accordingly, the Applicants respectfully request the Examiner to withdraw the rejection of Claim 13 over Pederson in view of Okawa.

8. Applicants have again traversed the Examiner's restriction requirement, after electing Invention II and arguing against the restriction. Applicants have amended the claims to overcome informalities. Applicants further request that the Examiner withdraw rejections for anticipation and obviousness, and advance the claims to allowance.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "D. W. Okey", written over a horizontal line.

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APPENDIX A

Marked-up version showing additions underlined and deletions in brackets:

1. (amended) An integrated light and accessory assembly for a motor vehicle, comprising:
 - an insulator;
 - at least one reflector mounted on said insulator;
 - at least one conductor mounted on said insulator;
 - at least one lamp connected to said at least one conductor and assembled inside said at least one reflector;
 - at least one control module mounted on said insulator and connected to said at least one conductor; and
 - a housing, enclosing the insulator, the at least one reflector, the at least one conductor, the at least one lamp and the at least one control module,
 - wherein the lamp and the reflector are adapted to provide illumination, and the conductor and [controller] the control module are adapted to receive electrical power.
6. (amended) The assembly of Claim 1, further comprising a device mounted to the [substrate] insulator and connected to least one conductor inside the housing, the device selected from the group consisting of an antenna, a sensor, and a transmitter.
14. (amended) An integrated light and accessory assembly for a motor vehicle, comprising:
 - an insulator;
 - at least one reflector mounted to said insulator;
 - at least one conductor mounted to said insulator;
 - at least one lamp connected to said at least one conductor and assembled inside said at least one reflector;
 - an electronic module mounted on said insulator and connected to said at least one conductor; and
 - a housing, enclosing the insulator, the at least one reflector, the at least one conductor, the at least one lamp and the [at least one control] electronic module,

wherein the lamp and the reflector are adapted to provide illumination, and the conductor and controller are adapted to receive electrical power.

15. (amended) The integrated light and accessory assembly of Claim 14, wherein the [integrated light and accessory assembly] lamp is selected from the group consisting of a headlamp, a fog lamp, a side lamp, a parking lamp, a hazard-warning lamp, a rear-illumination lamp, a dome lamp, and an interior lamp.